

CONWAY, FARRELL, CURTIN & KELLY, P.C.

ATTORNEYS AT LAW  
FORTY EIGHT WALL STREET  
NEW YORK, N.Y. 10005-2935

(212) 785-2929  
FAX (212) 785-7229

October 25, 2007

Hon. Alvin K. Hellerstein  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

Re: 21-MC-102 (AKH)  
Related docket #'s: 07 CV 4450 (AKH)  
06 CV 14553 (AKH)  
06 CV 12411 (AKH)

Our File #: GAB23002

Dear Judge Hellerstein:


This firm represents the defendants, Cammeby's Management Company, LLC s/h/a Cammeby's Management Co. LLC and 32-42 Broadway Owner LLC, in connection with the above docketed matters.

On October 9, 2007, you had signed a Stipulation and Order of Dismissal discontinuing all claims against my clients. A copy of this stipulation is enclosed.

Since my clients are no longer involved in this litigation, I respectfully request that you direct the Clerk to remove my name and firm from the ECF distribution list.

Thank you for your consideration herein.

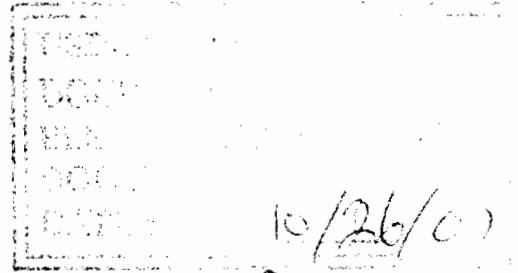
Very truly yours,

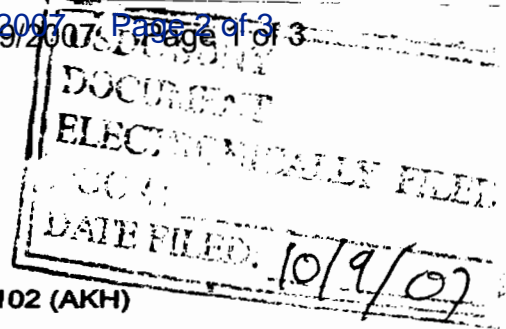


KRISTIN G. SHEA(KS2897)

KGS:ms-judge-02  
enclosure

cc:  
Worby Groner Edelman & Napoli Bern, LLP





UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

**STIPULATION AND  
ORDER OF DISMISSAL**

This order relates to:

07 CV 4450 (AKH)  
06 CV 14553 (AKH)  
06 CV 12411 (AKH)

\_\_\_\_\_  
**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, the attorneys of record for the parties to the above-entitled action, that whereas no party hereto is an infant or incompetent person for whom a committee has been appointed and no person not a party has an interest in the subject matter of the action, the above-entitled action be, and the same hereby is discontinued without prejudice as against defendants, CAMMEBY'S MANAGEMENT COMPANY, LLC and 32-42 BROADWAY OWNER LLC only, without costs to either party as against the other.

**IT IS FURTHER STIPULATED AND AGREED**, that should evidence be discovered throughout the course of the litigation which determines that CAMMEBY'S MANAGEMENT COMPANY, LLC and/or 32-42 BROADWAY OWNER LLC is/are a proper party to this suit, plaintiff may reinstitute the action without regards to the applicable statute of limitations, assuming said original action was timely commenced, and in such instance these defendants shall not assert the statute of limitations as a defense.

This stipulation may be filed without further notice with the Clerk of the Court.

Dated: New York, New York  
October 1, 2007

**CONWAY, FARRELL, CURTIN  
& KELLY, P.C.**

By: 

**KRISTIN G. SHEA (KGS2897)**

Attorneys for Defendants,  
**CAMMEBY'S MANAGEMENT  
COMPANY, LLC and 32-42  
BROADWAY OWNER LLC**  
48 Wall Street, 20<sup>th</sup> Floor  
New York, New York 10005  
(212) 785-2929

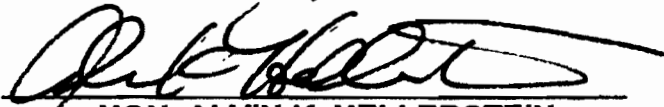
**WORBY GRONER EDELMAN  
& NAPOLI BERN, LLP**

By: 

**CHRISTOPHER R. LOPALO (CL6466)**

Attorneys for Plaintiff  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(212) 587-0031

SO ORDERED: 

  
**HON. ALVIN K. HELLERSTEIN**